

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States of America,

Plaintiff,

v.

Any and All Funds on Deposit at JPMorgan Chase  
Account Number 61442003 Held in the Name of CIA  
Minera Aurifera Santa Rosa SA, AKA COMARSA,  
et. al,

Defendants-in-  
Rem.

Civil Action No. 12-CV-7530 (GBD)

**NOTICE OF MOTION FOR  
EXPEDITED PRETRIAL  
STATUS CONFERENCE  
PURSUANT TO RULE 16**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Abbe David Lowell, and the accompanying Memorandum of Law, Claimant Compañía Minera Aurífera Santa Rosa S.A. ("COMARSA"), by and through its undersigned counsel, hereby moves this Court before the Honorable George B. Daniels, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order, pursuant to Rule 16 of the Federal Rules of Civil Procedure, for an expedited pretrial status conference to be held as soon as possible so that COMARSA may begin the process of contesting the complaint without undue delay and seek a means to ensure that its business is not unduly damaged in the process.

Dated: December 7, 2012

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell

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*Attorneys for Claimant CIA Minera Aurifera Santa Rosa SA.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 7, 2012 I caused a true and correct copy of the Notice of Motion for Expedited Pretrial Status Conference to be served via the CM/ECF system upon Preet Bharara, United States Attorney for the Southern District of New York, Sarah E. Paul, Assistant United States Attorney, and Paul Monteleoni, Assistant United States Attorney.

/s/ Abbe David Lowell  
Abbe David Lowell